

REMARKS

In response to the above-identified Office Action, the independent claims of the application have been amended and now relate to an image pickup apparatus having a plurality of photoelectric conversion elements and switching elements, and a protective layer to stabilize the device which is arranged on a substrate, wherein the protective layer covers the photoelectric conversion elements and the switching elements. Also, an additional layer is disposed on a flat surface of the protective layer, and the additional layer and protective layers are formed with different materials in order to separate their functions. Furthermore, the present invention is characterized by arranging a wavelength converter, comprising a columnar crystal scintillator, evaporated on the additional layer having the flattening surface.

As mentioned above, the functions are separated by using different materials, thereby stabilizing the feature of the protective layer; and, by arranging the wavelength converter comprising a columnar crystal on the surface of the flattening layer, an improvement is achieved.

From this claimed structure it is possible to overcome the issue mentioned on Page 8, line 20 through Page 9, line 11, of the Specification.

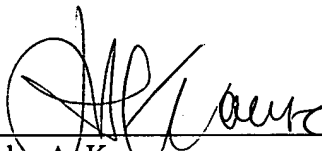
In this regard, Applicant believes that none of the cited references disclose or suggest the claimed requirement wherein a material of the additional layer is different from that of said protective layer, wherein a surface of the additional layer is flatter than the surface of said protective layer, and wherein said wavelength converter comprises a columnar crystal scintillator arranged by being deposited on a flat surface of the additional layer.

Also, none of those cited references recognize the issue of "resolving the problem of the steps which even could not be resolved by a protective layer provided for the device stabilization" as mentioned at Page 8, line 20 through Page 9, line 11 of the present Specification.

Accordingly, it is respectfully submitted that the amended claims are patentable over all of the cited references.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,



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